

From: [Lombardo, Ginny](#)
To: [Wainberg, Daniel](#); [Gilbert, Aaron](#); [Norcross, Jeffrey](#); [Gutro, Doug](#); [Wintrob, Paul](#); [Melanson, Kate](#)
Cc: [Hultgren, John](#); [Barmakian, Nancy](#); [Deegan, Dave](#)
Subject: RE: RI State Rep McNamara letter - RE: Ciba-Geigy Corrective Action Plan
Date: Friday, October 14, 2022 8:54:09 AM
Attachments: [FW Written Testimony-Safety-Kleen Systems Permit.msg](#)
[FW Article from Providence Journal \(thought you might be interested bc of SK Cranston\).msg](#)

Good Morning-

I see that Dan scheduled a time for us to connect on Monday regarding Rep McNamara's letter on the Ciba-Geigy RCRA CA site. Wanted to share a similar letter from Rep McNamara to RIDEM related to the ongoing RCRA TSDf permit renewal for Safety-Kleen, Cranston, RI. For Ciba-Geigy, Rep McNamara sent letters to both EPA and RIDEM. For Safety-Kleen, RIDEM is the permitting authority and Rep McNamara sent the letter to RIDEM as part of the permit's public comment period. The letter was shared with us by our DEM counterparts. Also, at the recent public hearing for the Safety-Kleen permit, a number of local citizens commented asking RIDEM to deny the permit over concerns about the facility flooding and made statements that Safety-Kleen has not prepared for climate change. RIDEM is now considering the public comments and the letter from Rep McNamara. Also attaching a recent article from the Providence Journal that speaks to flooding concerns for industrial/polluted sites in RI. Look forward to connecting with you all on Monday. Thank you.

-Ginny

From: Wainberg, Daniel <Wainberg.Daniel@epa.gov>
Sent: Thursday, October 13, 2022 3:23 PM
To: Gilbert, Aaron <Gilbert.Aaron@epa.gov>; Norcross, Jeffrey <Norcross.Jeffrey@epa.gov>; Gutro, Doug <Gutro.Doug@epa.gov>; Wintrob, Paul <Wintrob.Paul@epa.gov>; Melanson, Kate <Melanson.Kate@epa.gov>
Cc: Hultgren, John <Hultgren.John@epa.gov>; Lombardo, Ginny <Lombardo.Ginny@epa.gov>; Barmakian, Nancy <Barmakian.Nancy@epa.gov>; Deegan, Dave <Deegan.Dave@epa.gov>
Subject: RI State Rep McNamara letter - RE: Ciba-Geigy Corrective Action Plan

Hello All,

+ing Kate, Paul, and Dave D.

Aaron and I had a chance to connect on this. I think it would be good to meet and discuss next steps/strategy. I will look for a time early next week. Attached are the letters to Aaron Gilbert and to Terry Gray (Acting Director, RIDEM) along with the attachment to the letters, which Rep. McNamara included. Also, FYI I attached the email exchange where Aaron acknowledged receipt.

I will look for a time on the calendar for this group, but let me know if any others should be added or if anyone here doesn't need to be included. Let me know too if it makes sense to have a quick connect with any of you one-on-one.

Finally, Ginny is going to add on to this email regarding another communication from Rep McNamara regarding a permitted facility in RI.

Thank you

Dan Wainberg
[he/him]
RCRA Corrective Action and TSCA Section
EPA - New England
Office: 617.918.1283
Mobile: 617.413.4622
Fax: 617.918.0283
Wainberg.Daniel@epa.gov

From: Gilbert, Aaron <Gilbert.Aaron@epa.gov>
Sent: Thursday, October 13, 2022 11:00 AM
To: Wainberg, Daniel <Wainberg.Daniel@epa.gov>
Cc: Hultgren, John <Hultgren.John@epa.gov>; Norcross, Jeffrey <Norcross.Jeffrey@epa.gov>; Gutro, Doug <Gutro.Doug@epa.gov>; Lombardo, Ginny <Lombardo.Ginny@epa.gov>; Barmakian, Nancy <Barmakian.Nancy@epa.gov>
Subject: Ciba-Geigy Corrective Action Plan

Hi Dan,

FYI – letter to Acting Director, Gray.

While I had planned to acknowledge receipt, I will not respond further to Representative McNamara until you and I talk today at 1pm.

Aaron

From: Rep. McNamara, Joseph M. <Rep-McNamara@rilegislature.gov>
Sent: Thursday, October 13, 2022 10:19 AM
To: Gilbert, Aaron <Gilbert.Aaron@epa.gov>
Subject: FW: Ciba-Geigy Corrective Action Plan

From: Rep. McNamara, Joseph M.
Sent: Thursday, October 13, 2022 10:18 AM
To: Gray, Terry (DEM) <terry.gray@dem.ri.gov>
Cc: Aaron Gilbert (<Gilbert.aron@epa.gov> <Gilbert.aron@epa.gov>
Subject: Ciba-Geigy Corrective Action Plan

State of Rhode



HOUSE OF REPRESENTATIVES
REPRESENTATIVE JOSEPH M. McNAMARA, *District 19*
Chairman, Committee on Education

October 13, 2022

Mr. Terrence Gray
Acting Director, DEM
Deputy Director-Environmental Protection
terry.gray@dem.ri.gov

SUBJECT: Ciba-Geigy Corrective Action Plan

Dear Director Gray:

The recent increase in the frequency of flooding of the Pawtuxet River Watershed in Warwick and Cranston has raised several concerns in the abutting residential communities. A specific area of concern is the former site of the Ciba-Geigy Chemical Company located at 180 Mill Street in Cranston. The chemical company operated on the site operated from 1954 to 1986. The U.S. Environmental Protection Agency (EPA) – Region 1 is currently monitoring a RCRA Corrective Action Plan at the site.

During the 2010 flooding of the Pawtuxet River, adjacent neighborhoods in both Warwick and Cranston were flooded. When the river receded, varying depths of sediment were left on neighborhood properties. Home and business owners were left on their own to remove this sediment, which in many cases had what residents described as “petro chemical” odors which were also described as a “toxic chemical smells”. The Rhode Island Department of Health recommended that individuals should wear N95 masks when removing or shoveling this substance. I purchased a case and handed them out to residents of the effected neighborhoods.

The 2010 flood was described as a “once in 100 years flood”. Last month 15 inches of rain fell in a few hours, flooding and closing Interstate 95 in Providence. If this storm had occurred 2 miles South-West of Providence, it would have led to a major flooding event as defined by the National Oceanic and Atmosphere Administration. My concern is that the PCB’s and other toxic chemicals that are currently sequestered and capped will permeate the sand and wells located at this site and migrate into the river and its sediment. Based on the toxic legacy left by Ciba-Geigy, I strongly believe that the increased flooding due to climate change will have a contributing effect on the threat that this site poses to human health and the environment.

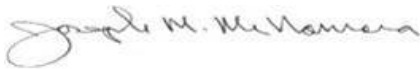
I would like to respectfully request that the EPA in consultation with eh RI DEM develop a plan that addresses the following issues:

1. Public notification of the results of any testing that is done on the site, including the die testing to determine is PCB’s are leaching into wells and the river.

2. Develop a community notification plan if ground water containments are leaked into the Pawtuxet River.
3. Develop a plan to address the remediation of contamination sediment on residential and business properties that minimizes the risk to human health and the environment.
4. Develop plans that use weather models that factor in projected increases in flooding events based upon updated climate data.

Please feel free to contact me on my cell, (401) 742-5297 if you have any questions. Thank you in advance for your kind consideration of this request.

Sincerely,



Joseph M. McNamara
Chairman, House Committee on Education
Representative District 19-Cranston/Warwick
State House, Room 135
Providence, RI 02903
(401) 222-2296
Rep-mcnamara@rilegislature.gov

JMM/lac

Attachment: U.S. Environmental Protection Agency (EPA) – Region 1
RCRA Corrective Action Plan
Former Ciba-Geigy Facility, May 25, 2016

cc: Aaron Gilbert, EPA

23 Howie Avenue, Warwick, Rhode Island 02888
State House, Room 135, Providence, Rhode Island 02903